

SUPPLEMENTAL BASIS STATEMENT

Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision Under the 1997 8-Hour Ozone National Ambient Air Quality Standard (NAAQS)

List of Commenters

- (1) Anne Arnold
United States Environmental Protection Agency
Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

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1. Page 4, Footnote 5: reference is being made to the applicable major source thresholds which should read “50” tons per year for VOC.

The Department has made the suggested correction.

2. Page 7: As part of the mentioned RACT revisions, Maine should highlight the updating of its solvent cleaning rule, Chapter 130, approved into the SIP on 5/26/2005 (70 FR 30367). Likewise, since there is a Solvent Cleaning Control Techniques Guideline (CTG), “Solvent Cleaning” should be removed from the list on the second full paragraph on page 8.

The Department has made the suggested correction.

3. Page 7: Maine determined that its previous asphalt paving regulations “no longer constituted RACT under the 8-hour ozone standard.” The revised Maine Chapter 131 regulation, listed in Table 1 as control measure 29, addressing the CTG for Asphalt paving should be submitted for incorporation in the Maine SIP prior to, or concurrently with, this proposed RACT Certification.

The Department is planning to submit the revised Chapter 131 for incorporation into the Maine SIP concurrently with the proposed RACT certification.

4. Page 10: Reference is made to the Tatermeal single source volatile organic compound (VOC) RACT air emission license amendment being included for incorporation in the Maine SIP as Appendix A. We have reviewed the license and found that it adequately addresses RACT requirements for the Tatermeal facility.

The Department would like to thank EPA Region 1 staff for their assistance in completing this air emissions license amendment.

5. Table 1: The listed control measures 16 and 31 are duplicate entries, both addressing the CTG for "Leaks from gasoline Tank trucks and Vapor Collection System (1978)." We recommend control measure 16 be deleted, since control measure 31 contains additional information and the accurate SIP approval date reference.

The Department has made the suggested correction.

6. Table 3, Page 22: It would be helpful if the emissions listed in Table 3 were labeled as potential or actual emissions. According to the narrative on page 9 it appears that they are licensed (potential to emit) emissions.

The emissions listed in Table 3 are licensed, or potential to emit, emissions. The Department has amended Table 3 to clarify that these are licensed emissions.

7. Table 3: There are several facilities, such as Prime Tanning, for which EPA previously approved a single source RACT determination which are not listed in Table 3. Conversations with Maine DEP staff indicate that some of these facilities may have been permanently closed. Maine should clarify this in its RACT Certification. At a minimum, Maine should address the following VOC RACT and NOx RACT approvals: (4/18/00; 65 FR 20754) and (5/20/02 67 FR 35441) for VOC RACT; and (9/9/02; 67 FR 57154) for NOx RACT.

The Department has amended its proposal to include an additional table (Table 4) detailing the permanently-closed sources previously receiving VOC and/or NOx RACT approvals.

8. Table 3: It appears that the terminal activities in South Portland for the facilities of CITGO Petroleum Corporation, ExxonMobil Oil Corporation, and Portland Pipe Line Corporation would be subject to Maine's Chapter 112, "Bulk Terminal Petroleum Liquid Transfer Requirements." If this is the case, Chapter 112 should be referenced in Table 3, rather than Chapter 134, (which specifically exempts VOC processes subject to CTG-based regulations.

The Department has made the suggested correction.

9. Table 3: For a few facilities, "subject to BACT," is listed in table 3. Although Maine's Chapter 134 exempts VOC-emitting equipment or processes that are subject to Best Available Control technology (BACT), this exemption does not necessarily apply to the entire facility. For example, one coating line at a facility could be subject to BACT, while other coating lines at that facility are subject to RACT. Therefore, more detail should be provided for the facilities where "subject to BACT" is indicated.

The Department has reviewed the air emissions licenses for the facilities identified in Table 3 that are identified as subject to BACT: Boralex Livermore Falls, LP; Irving Tanning Company; Louisiana-Pacific Corporation (New Limerick); and Dingley Press.

Our review determined that all units/lines at these facilities subject to RACT are in fact being controlled by BACT.

For example, Dingley Press operates six printing presses and supporting equipment. Each press is a web fed heatset offset lithographic printing press and is comprised of multiple printing units and dryers. Supporting equipment includes pre-press operations, bindery/ink jet printing lines, and cold cleaning degreasers.

The Department's BACT analysis for this operation addressed both pre-press and press operation emissions, with additional control equipment being found not to be economically justified for the Pre-press Operations (BACT was determined to be the continuation of good housekeeping practices for Pre-Press operations).

Press operations are also subject to BAT, and are controlled through the use of either a Regenerative Thermal Oxidizer (RTO), or Catalytic Incinerator. Dingley uses a Wolverine RTO-25,000 regenerative thermal oxidizer (RTO #1) and a TANN Corporation Model TR 2094 regenerative thermal oxidizer (RTO #2) to control VOCs from Presses #3, #5, #6, #7, and #8. A Quantum 7000 Catalytic Incinerator is used to control VOCs from Press #4.

The Department has added additional detail in Table 3 (see "Notes") for each of the facilities that are controlled by BACT.

10. Table 3: For the FMC Corporation, FPL Energy, Huhtamaki Foodservice Inc., and Portsmouth Naval Shipyard facilities, Table 3 references NOx single source SIP revisions. The appropriate citation for the EPA approval of these SIP revisions is 9/9/2002, 67 FR 57148).

The Department has made the suggested correction.

11. Table 3: for the SIP approval dates listed for the Pioneer plastics corporation, the VOC and NOx citations are reversed.

The Department has made the suggested correction.

12: Table 3: For the Red Shield Acquisition facility, Table 3 indicates how VOV requirements are being addressed, but does not indicate how the NOx RACT requirements are being addressed. According to the table, emissions are above the 100 tons per year major source threshold for NOx.

The Red Shield Acquisition facility (Old Town) is not subject to federally-approved RACT because it is located in Penobscot County, which is included in that portion of Maine receiving a section 182(f) NOx waiver. The Department has amended its proposal to clarify that this facility is exempt from NOx RACT requirements.

13. Table 3: The Verso Bucksport LLC facility has a typographical error in the SIP approval date. The correct citation should be 4/18/00.

The Department has made the suggested correction.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

July 24, 2009

Jeff Crawford
Bureau of Air Quality
Maine Department of Environmental Protection
State House, Station No. 17
Augusta, ME 04333

Dear Mr. Crawford:

Thank you for the opportunity to review and comment on your proposal to amend the Maine State Implementation Plan (SIP). This SIP revision addresses the requirements for the implementation of Reasonably Available Control Technology (RACT) regarding the 1997 8-hour ozone standard.

As you know, on March 24, 2008 (73 FR 15416), EPA issued a finding of failure to submit for Maine for its RACT SIP. This finding started an 18 months sanctions clock. Maine should submit this RACT Certification to EPA as a SIP revision as soon as possible to stop the sanctions clock.

We have reviewed the proposed RACT Certification and you will find the Agency's comments in the Enclosure. If you have any questions regarding this matter, please contact Ariel Garcia of my staff at 617-918-1660.

Sincerely,

A handwritten signature in cursive script that reads "Anne Arnold".

Anne Arnold, Manager
Air Quality Planning Unit

Enclosure

cc: Marc Cone, ME DEP

Enclosure

**EPA's Comments on Maine's Proposed RACT SIP
For the 1997 8-hour Ozone Standard**

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- 5) Table 1: The listed control measures 16 and 31 are duplicate entries, both addressing the CTG for "Leaks from Gasoline Tank Trucks and Vapor Collection System (1978)." We recommend control measure 16 be deleted, since control measure 31 contains additional information and the accurate SIP approval date reference. (Chapter 120 was not revised in the 10/15/96 notice as listed in control measure 16.)
- 6) Table 3, Page 22: It would be helpful if the emissions listed in Table 3 were labeled as potential or actual emissions. According to the narrative on page 9 it appears that they are licensed (potential to emit) emissions.
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